INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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June 20, 2003

TO: Interested Parties / Applicant

RE: Rieke Corporation 033-17469-00023

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

June 20, 2003

Mr. Jim Zurawski
Rieke Corporation
500 West Seventh Street
Auburn, IN 46706

Re: 033-17469
First Minor Permit Modification to
Part 70 No.: T 033-7140-00023

Dear Mr. Zurawski:

Rieke Corporation was issued a Part 70 permit on November 22, 2002, for stationary operation of various steel and plastic drum closure production plant. A letter requesting changes to this permit was received on April 10, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is related to the addition of one (1) paint spray line identified as 005a, one (1) preheat oven, and one (1) bake oven. The two (2) ovens are insignificant activities.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

mm
cc: File - Dekalb County
U.S. EPA, Region V
Dekalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Rieke Corporation
500 West 7th Street
Auburn, Indiana 46706

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T033-7140-00023	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:November 22, 2002 Expiration Date:November 22, 2007

First Minor Permit Modification No.: 033-17469	Pages Modified: 3, 4, 4a, 24, 25
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:June 20, 2003

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
C.13 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.16 Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Paint

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]
D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

D.2 FACILITY OPERATION CONDITIONS- shot blasting

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [[40 CFR 52 Subpart P]

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

Certification
Emergency Occurrence Report
Quarterly Deviation and Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates this stationary operation of various steel and plastic drum closure products.

Responsible Official:	Mr. Don J. Laipple, Vice President and General Manager
Source Address:	500 West 7th street Auburn, Indiana 46706
Mailing Address:	500 West 7th street Auburn, Indiana 46706
Phone Number:	(219) 925-3700
SIC Code:	3089 plastic products, 3499 fabricated metal products
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD or Emission Offset Rules; Major, under CAA 112 (Haps)

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Paint spray booth, identified as No.1, with a maximum capacity of 6,200 units per hour, using a water wash curtain for particulate control, and exhausting through stack No.1.

(b) Paint spray booth, identified as 005a, with a maximum capacity of 3000 units per hour, using dry filters for particulate control, and exhausting through stack No.5.

(c) An alkaline non-cyanide zinc bath, with a maximum capacity of 25,000 units per hour, exhausting through stack No. 5 and No. 6, installed in 1968.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Shot blaster, with a maximum capacity of 1643 lbs /hr of steel, using a baghouse as particulate control. [326 IAC 6-3-2].

(b) One (1) natural gas-fired preheat oven, with a maximum heat input capacity of 0.5 mmBtu/hr.

(c) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 0.8 mmBtu/hr.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Paint spray booth, identified as No.1, with a maximum capacity of 6,200 units per hour, using a water wash curtain for particulate control, and exhausting through stack No.1.

(b) Paint spray booth, identified as 005a, with a maximum capacity of 3000 units per hour, using dry filters for particulate control, and exhausting through stack No.5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter (PM) (Process Operations) [40 CFR 52 Subpart P]

Pursuant to T033-7140-00023 issued on November 22, 2002, the particulate matter (PM) from the paint spray booth #1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The surface coating booth 005a is limited to 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that applies extreme performance coatings designed for exposure to outdoor weather at all times.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

The water wash curtain shall be in operation at all times the paint spray booth no. 1 is in operation, in order to comply with the limit in Condition D.1.1. The dry filters shall be in operation in accordance with manufacturer's specifications at all times surface coating line 005a is in operation,

in order to comply with the limit in Condition D.1.1.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Monitoring

The compliance monitoring requirements applicable to this source are as follows:
The paint spray booth no. 1 has applicable compliance monitoring conditions as specified below:

(1) Water Wash Scrubbing System: Daily inspections shall be performed to verify that the water level of the water pans meet recommended levels contained in established written, work procedures. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Screens in

the wash water scrubbing system shall be maintained to prevent a reduction in the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the condition of the baffles meet the recommendations contained in established, written, work procedures. In addition, weekly observations shall be made of the overspray from the surface coating booth stack No. 1 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, for paint spray booth no. 1, the Permittee shall maintain a log of weekly overspray observations, daily inspections of the water level in the pans, weekly and monthly inspections of the condition of baffle panels, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Minor Source Modification
and Minor Permit Modification

Source Name:	Rieke Corporation
Source Location:	500 West Seventh Street, Auburn, IN 46706
County:	Dekalb
SIC Code:	3089
Operation Permit No.:	T033-7140-00023
Operation Permit Issuance Date:	November 22, 2002
Permit Modification No.:	033-17469
Source Modification No.:	033-16932
Permit Reviewer:	Madhurima D. Moulik

On April 24, 2003, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star in Auburn, Indiana, stating that Rieke Corporation had applied for a construction permit to construct and operate one (1) paint booth and two (2) ovens. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Rieke Corporation has requested that the new surface coating booth be limited to 3.5 pounds per gallon of coating less water as specified in 326 IAC 8-2-9(d)(3) for extreme performance coatings (this surface coating operation is for parts of drums designed for outdoor weather), instead of the 15 pounds per day emission limit. Based on this request by the source, OAQ has decided to make the following changes to the Part 70 permit (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Condition D.1.2 is stated as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

~~Any change or modification which would increase actual emissions of VOC for paint booth 005a when coating metal parts to greater than fifteen pounds per day shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-2-9.~~

The surface coating booth 005a is limited to 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that applies extreme performance coatings designed for exposure to outdoor weather at all times.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Rieke Corporation
Source Location:	500 West Seventh Street, Auburn, IN 46706
County:	Dekalb
SIC Code:	3089
Operation Permit No.:	T033-7140-00023
Operation Permit Issuance Date:	November 22, 2002
Source Modification No.:	033-16932
Permit Modification No.:	033-17469
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Rieke Packaging Systems, relating to the production of various steel and plastic drum closure products. The modifications are related to the addition of the following emission units:

(1) Paint spray booth, identified as 005a, with a maximum capacity of 3000 units per hour, using dry filters for particulate control, and exhausting through stack No.5.

(2) One (1) natural gas-fired preheat oven, with a maximum heat input capacity of 0.5 mmBtu/hr.

(3) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 0.8 mmBtu/hr.

History

On January 7, 1998, Rieke Packaging Systems submitted an application to the OAQ requesting to add an additional surface coating line, one (1) preheat oven, and one (1) bake oven to their existing plant. The source was issued a Part 70 permit on November 22, 2002.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(A), which states that a Minor Source Modification can be used for modifications that would have a potential to emit “less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM-10)”. The potential to emit of the modification requested falls within this range. Additionally, the Part 70 permit is being modified through a Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(B), which states that a Minor Permit Modification can be used for changes that “do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the

Part 70 permit". The additional surface coating line would be subject to the same applicable requirements as the existing surface coating line. The two (2) new ovens are insignificant activities with no applicable requirements.

Existing Approvals

The source was issued a Part 70 Operating Permit T033-7140-00023 on November 22, 2002.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary of Modification

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
Stack # 5	Spray Booth 005a	Not Available	2	Not Available	77

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 18, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit of the Source Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	5.12
PM-10	5.12
SO_2	Negligible
VOC	4.87
CO	0.5
NO_x	0.6

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Glycol Ether	1.56
Formaldehyde	0.18
Phenol	0.49
TOTAL	2.23

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM/PM-10 is less than 25 tons per year but greater than 5 tons per year. Therefore, the modification is subject to the provisions of 326 IAC 2-7-10.5(d).

Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Methyl Ethyl Ketone	greater than 10
Combination HAPs	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit of Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs

Surface Coating 005a	5.12	5.12	Negligible	4.87	Negligible	Negligible	<10
Total Emissions							

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Dekalb County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the new surface coating line identified as 005a and the two (2) new ovens.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to the new surface coating line identified as 005a and the two (2) new ovens.

State Rule Applicability - Entire Source

The state rule applicability for the entire source remains unchanged as a result of this modification.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations) and 40 CFR 52 Subpart P

The surface coating line 005a uses more than 5 gallons of coating per day. Therefore, it is subject to the requirements of 326 IAC 6-3.

Pursuant to 326 IAC 6-3-2(d), the dry filters shall be in operation in accordance with manufacturer's specifications at all times surface coating line 005a is in operation.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The new surface coating operation when coating metal parts, to be constructed after 1990, will begin operation in June 2003, and thus have no actual VOC emissions. Therefore, according to 326 IAC 8-2-1(a)(4), it is not subject to the requirements of 326 IAC 8-2-9.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements of New Facilities)

The potential VOC emissions from the new surface coating booth 005a when coating plastic parts is less than 25 tons per year. Therefore 326 IAC 8-1-6 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the new surface coating line 005a are as follows:

There is no specific compliance monitoring requirement for the surface coating line 005a.

CHANGES TO PART 70 PERMIT

(1) Section A.2 is modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Paint spray booth, identified as No.1, with a maximum capacity of 6,200 units per hour, using a water wash curtain for particulate control, and exhausting through stack No.1.

(b) Paint spray booth, identified as 005a, with a maximum capacity of 3000 units per hour, using dry filters for particulate control, and exhausting through stack No.5.

(~~b~~ **c**) An alkaline non-cyanide zinc bath, with a maximum capacity of 25,000 units per hour, exhausting through stack No. 5 and No. 6, installed in 1968.

(2) Section A.3 is modified as follows:

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

(a) Shot blaster, with a maximum capacity of 1643 lbs /hr of steel, using a baghouse as particulate control. [326 IAC 6-3-2]

(b) One (1) natural gas-fired preheat oven, with a maximum heat input capacity of 0.5 mmBtu/hr.

(c) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 0.8 mmBtu/hr.

(3) The facility description in Section D.1 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]:

(a) Paint spray booth, identified as No.1, with a maximum capacity of 6,200 units per hour, using a water wash curtain for particulate control, and exhausting through stack No.1.

(b) Paint spray booth, identified as 005a, with a maximum capacity of 3000 units per hour, using dry filters for particulate control, and exhausting through stack No.5.

(4) Condition D.1.1 is modified as follows:

D.1.1 Particulate Matter (PM) (Process Operations) [326 IAC 6-3-2 **and 40 CFR 52 Subpart P**]

Pursuant to **T033-7140-00023 issued on November 22, 2002**, the particulate matter (PM) from the paint spray booth **#1** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(5) A condition is added for a VOC limit for paint booth 005a.

D.1.2 Volatile Organic Compounds (VOC)

Any change or modification which would increase actual emissions of VOC for paint booth 005a when coating metal parts to greater than fifteen pounds per day shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 8-2-9.

(6) Condition D.1.3 is modified as follows:

Compliance Determination Requirements

D.1.~~3~~ **4** Particulate Matter (PM)

The water wash curtain shall be in operation at all times the paint spray booth **#1** is in operation, in

order to comply with ~~this limit~~ **the limit in Condition D.1.1**. **The dry filters shall be in operation in accordance with manufacturer's specifications at all times surface coating line 005a is in operation, in order to comply with the limit in Condition D.1.1.**

(7) The new spray paint line 005a does not have any compliance monitoring requirements since the potential to emit of PM/PM-10 is less than 10 pounds per hour. Therefore, condition D.1.4 and D.1.5 are modified as follows:

D.1.~~4~~ **5** Monitoring

The compliance monitoring requirements applicable to this source are as follows:
The paint spray booth **no. 1** has applicable compliance monitoring conditions as specified below:

D.1.~~5~~ **6** Record Keeping Requirements

(a) To document compliance with Condition D.1.4, **for paint spray booth no. 1,** the Permittee shall maintain a log of weekly overspray observations, daily inspections of the water level in the pans, weekly and monthly inspections of the condition of baffle panels, and those additional inspections prescribed by the Preventive Maintenance Plan.

(8) The subsection in section D.1 are re-numbered in the Table in Contents.

Conclusion:

The source modification 033-16932 shall be added to the conditions of the Part 70 permit as permit modification 033-17469.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Company Name: Rieke Packaging Systems
Address City IN Zip: 500 West Seventh Street, Auburn, IN 46706
CP: 033-17469
Plt ID: 033-00023
Reviewer: Madhurima D. Moulik
Date: 04/10/03

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.3	11.4

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.6	0.0	0.5

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions
Company Name: Rieke Packaging Systems
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HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.196E-05	6.833E-06	4.271E-04	1.025E-02	1.936E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.847E-06	6.263E-06	7.972E-06	2.164E-06	1.196E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Rieke Packaging Systems
Address City IN Zip: 500 West Seventh Street, Auburn, IN 46706
CP: 033-16932
Plt ID: 033-00023
Reviewer: Madhurima D. Moulik
Date: 04/10/03

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Resco LT Brown	9.7	43.60%	14.1%	29.5%	16.4%	43.90%	0.00013	3000.000	3.41	2.85	1.11	26.70	4.87	5.12	6.50	45%
Resco Red	9.5	59.50%	40.5%	19.0%	46.2%	30.50%	0.00013	3000.000	3.36	1.81	0.70	16.91	3.09	3.62	5.92	45%
Resco Olive Greer	9.8	45.40%	17.9%	27.5%	21.0%	42.00%	0.00013	3000.000	3.40	2.69	1.05	25.15	4.59	5.01	6.40	45%
									(Worst Case) =		**1.11**	**26.70**	**4.87**	**5.12**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

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Address City IN Zip: 500 West Seventh Street, Auburn, IN 46706
CP: 033-16932
Plt ID: 033-00023
Reviewer: Madhurima D. Moulik
Date: 04/10/03

Material	Density (Lb/Gal)	Wt % Phenol	Wt % Formaldehyde	Wt % Glycol Ether	Gal of Material (gal/unit)	Unit/hr	Phenol (lb/hr)	Formaldehyde (lb/hr)	Glycol Ether (lb/hr)	Phenol (tons/yr)	Formaldehyde (tons/yr)	Glycol Ether (tons/yr)
Resco LT Brown	9.7	2.90%	1.1%	0.0%	0.00013	3000.00	0.11	0.04	0.00	0.48	0.17	0.00
Resco Red	9.5	0.00%	0.0%	9.6%	0.00013	3000.00	0.00	0.00	0.36	0.00	0.00	1.56
Resco Olive Green	9.8	2.93%	1.1%	0.0%	0.00013	3000.00	0.11	0.04	0.00	0.49	0.18	0.00
							Worst Case PTE =			**0.49**	**0.18**	**1.56**